

# UNITED STATES DISTRICT COURT

for the  
Middle District of North Carolina

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)  
Snapchat accounts "vouna dre145" and  
[REDACTED]

Case No. 1:22MJ239-1

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Central District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 U.S.C. § 2422(b)	Coercion and Enticement
18 U.S.C. § 2252A(a)(2)(A)	Receipt of Child Pornography
18 U.S.C. § 2252A(a)(5)(B)	Possession of Child Pornography

The application is based on these facts:  
See attached Affidavit

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ Emily R. Keller

Applicant's signature

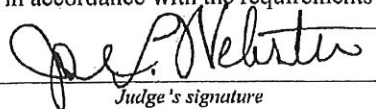
Emily R. Keller/FBI Special Agent

Printed name and title

On this day, the applicant appeared before me via reliable electronic means, that is by telephone, was placed under oath, and attested to the contents of this Application for a search warrant in accordance with the requirements of Fed. R. Crim. P. 4.1.

Date: 06/06/2022 8:58 am

City and state: Durham, NC



Judge's signature

Hon. Joe L. Webster, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

IN THE MATTER OF THE  
SEARCH OF SNAPCHAT  
ACCOUNTS "YOUNG DRE145"  
AND [REDACTED]

Case No. 1:22MJ239-1

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, Emily R. Keller, a Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

INTRODUCTION

1. I am investigating offenses related to child sexual exploitation. I make this affidavit in support of an application for a warrant to search information related to Snapchat account "young\_dre145" ("SUBJECT ACCOUNT") and Snapchat account [REDACTED] ("MINOR-1 ACCOUNT 1"). The information is stored at premises owned, maintained, controlled, or operated by Snap Inc., a company headquartered in the Central District of California. This affidavit is made in support of an application for a search warrant under Title 18 U.S.C. §§ 2252A(a)(2)(A), 2252A(a)(5)(B), and 2422(b) to require Snap Inc. to disclose to the government records and other information in its possession, pertaining to the SUBJECT ACCOUNT and MINOR-1 ACCOUNT.

2. The statements in this Affidavit are based in part on information provided by other law enforcement officers and on my investigation of this matter. Since this Affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that contraband and evidence, fruits, and instrumentalities of violations of Title 18 U.S.C. §§ 2252A(a)(2)(A), 2252A(a)(5)(B), and 2422(b), are presently located in the SUBJECT ACCOUNT and MINOR-1 ACCOUNT.

#### **AFFIANT BACKGROUND**

3. I am a Special Agent of the Federal Bureau of Investigation ("FBI") and have been since October of 2019. My initial training consisted of an eighteen-week FBI new agent course during which I received instruction on various aspects of federal investigations, ranging from economic espionage and child pornography, to kidnapping and computer intrusions. In addition, I have earned both a Bachelor of Arts in International Studies and a Master of Public and International Affairs.

4. I am currently assigned to the Charlotte Division and stationed at the Greensboro Resident Agency. I have investigated cases involving child exploitation for over two years. Prior to becoming a Special Agent of the FBI, I



worked as a Staff Operations Specialist, investigative analyst, for the FBI for over four years.

5. I have supported numerous FBI investigations through investigative research and analysis, to include investigations of cybercrime. I am familiar with, and have employed, investigative techniques used in these investigations. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2252A and 2422, and I am authorized by law to request a search warrant. As a Special Agent, I am authorized to investigate violations of laws and to execute warrants issued under the authority of the United States.

#### STATUTORY AUTHORITY

6. As noted above, this investigation concerns alleged violations of the following:

- a. 18 U.S.C. § 2252A(a)(2)(A) prohibits a person from knowingly receiving or distributing child pornography, as defined in 18 U.S.C. § 2256(8), using any means and facility of interstate and foreign commerce, that has been mailed, or that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer. Attempts and conspiracies are also violations of this statute.



b. 18 U.S.C. § 2252A(a)(5)(B) prohibits a person from knowingly possessing or knowingly accessing with intent to view any material that contains an image of child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer. Attempts and conspiracies are also violations of this statute.

c. 18 U.S.C. § 2422(b) prohibits a person from knowingly persuading, inducing, enticing, or coercing any individual who has not attained the age of 18 years, to engage in sexual activity, using any means of interstate and foreign commerce, that has been mailed, or that has been shipped and transported in affecting interstate and foreign commerce by any means, including by computer.

#### DEFINITIONS

7. The following definitions apply to this Affidavit and Attachment

B:

- a. "Chat," as used herein, refers to any kind of text communication over the Internet that is transmitted in real-time from sender to receiver. Chat messages are generally short in order to enable other participants to respond quickly and in a format that resembles an oral conversation. This feature distinguishes chatting from other text-based online communications such as Internet forums and email.
- b. "Child erotica," as used herein, means materials or items that are sexually arousing to persons having a sexual interest in minors but that are not necessarily obscene or do not necessarily depict minors engaging in sexually explicit conduct.
- c. "Child pornography," as defined in 18 U.S.C. § 2256(8), is any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical or other means, of sexually explicit conduct, where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the

visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct.

- d. "Computer," as used herein, refers to "an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device" and includes smartphones, other mobile phones, and other mobile devices. *See* 18 U.S.C. § 1030(e)(1).
- e. "Hashtag," as used herein, refers to a word or phrase preceded by a hash or pound sign (#), which is used to identify messages or groups on a specific topic.
- f. An "Internet Protocol address" or "IP address," as used herein, refers to a unique numeric or alphanumeric string used by a computer or other digital device to access the Internet. Every computer or device accessing the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer or device may be directed properly from its source to its destination. Most Internet Service Providers ("ISPs") control a range of IP addresses. IP addresses can be "dynamic," meaning that the ISP assigns a different unique number to a computer or



device every time it accesses the Internet. IP addresses might also be “static,” if an ISP assigns a user’s computer a particular IP address that is used each time the computer accesses the Internet. ISPs typically maintain logs of the subscribers to whom IP addresses are assigned on particular dates and times.

- g. The “Internet” is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.
- h. “Minor,” as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.
- i. “Mobile application” or “chat application,” as used herein, are small, specialized programs downloaded onto mobile devices, computers and other digital devices that enable users to perform a variety of functions, including engaging in online chat and sending or receiving images and videos.
- j. “Records,” “documents,” and “materials,” as used herein, include all information recorded in any form, visual or aural, and by any means, whether in handmade, photographic, mechanical, electrical, electronic, or magnetic form.

- k. "Remote computing service," as defined in 18 U.S.C. § 2711(2), is the provision to the public of computer storage or processing services by means of an electronic communications system.
- l. "Sexually explicit conduct," as defined in 18 U.S.C. § 2256(2), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the anus, genitals, or pubic area of any person.
- m. "Visual depiction," as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.
- n. A "Virtual Private Network" or "VPN," as used herein, refers to the opportunity to establish a protected network connection when using public networks.

#### **BACKGROUND ON SNAPCHAT**

8. Based on my training and experience, Snapchat is a mobile application made by Snap Inc., and is available through the Apple iPhone "app

store” and Google Play. The application provides users a way to share photos, videos, and texts. Subscribers obtain an account by downloading the free Snapchat application to their mobile media device and registering an account with Snapchat. During the registration process, Snapchat asks subscribers to provide basic personal information. Therefore, the computers of Snap Inc., are likely to contain stored electronic communications and information concerning subscribers and their use of Snapchat services, such as account access information, account application information and content such as saved photos, videos, and text/chat messages.

9. Snapchat users can take photos or videos (“Snaps”) using their camera phone in real-time and then select which of their friends to send the message to. Unless the sender or recipient opts to save the photo or video, the message will be deleted from their devices (after the content is sent in the case of the sender and after it is opened in the case of the recipient). Users are able to save a photo or video they have taken locally to their device or to “Memories,” which is Snapchat’s cloud-storage service.

10. Snapchat users can add a photo or video Snaps to their “Story.” Depending on the user’s privacy settings, the photos and videos added to their Story can be viewed by either all Snapchat users or just the user’s friends for up to 24 hours. Stories can also be saved in Memories until deleted by the user.



11. "Memories," Snapchat's cloud-storage service, is where users can save their sent or unsent Snaps, posted stories, photos and videos from their phone's photo gallery. A user can also edit or send Snaps and create stories from these Memories. Snaps and stories, backed up by Snap Inc., may remain in Memories until deleted by user.

12. Another feature available to Snapchat users is the chat feature. A user can type messages, send photos, videos, audio notes and video notes to friends within the Snapchat application. A user sends a chat message to a friend and once it is viewed by both the sender and the recipient, and both parties swipe away from the chat screen, the message will be cleared. Within the Snapchat application itself, a user can opt to save part of the chat by tapping on the message that they want to keep. The user can clear the message by tapping it a second time.

13. When registering a Snapchat account, the user must select a username that is a unique identifier associated with a specific user on Snapchat and cannot be changed by the user once selected. A user can also select a vanity name which is not a unique identifier and can be changed by a user or that user's friends to indicate how the user will appear within the Snapchat application.

#### PROBABLE CAUSE

14. On August 23, 2021, [REDACTED] ("MPD"), in [REDACTED], received a report by the parent, Parent-1, of a 12-year-old minor female, Minor-1, alleging Snapchat user "young\_dre" participated in sexually explicit Snapchat chats with Minor-1. Parent-1 identified the referenced Snapchat chats on Minor-1's cell phone.

15. On September 3, 2021, Parent-1 voluntarily provided Minor-1's cell phone to MPD. With Parent-1 present, MPD identified Snapchat chats between Snapchat user "young\_dre145" ("SUBJECT ACCOUNT") and Minor-1's Snapchat account [REDACTED] ("MINOR-1 ACCOUNT") on Minor-1's cell phone. MPD captured the entirety of the Snapchat chats available on Minor-1's phone at that time in a video recording.

16. On February 10, 2022, MPD and the FBI conducted an interview of Minor-1. During the interview, Minor-1 viewed the video recording captured by MPD of the Snapchat chats between herself and the SUBJECT ACCOUNT. Minor-1 explained she started talking to the user of the SUBJECT ACCOUNT before June 15, 2020, the first date identified in the Snapchat chats. She advised their relationship started on Dubsmash<sup>1</sup>. They mostly communicated by sending texts, videos, pictures, and voice messages back and forth on

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<sup>1</sup> Dubsmash was a video sharing social media service application.

Snapchat. She believed the user of the SUBJECT ACCOUNT was a twenty something year old black man who lived in New York.

17. As the interview continued, Minor-1 advised she sent numerous nude photos of herself to the user of the SUBJECT ACCOUNT, mostly because he asked. Minor-1 explained that the user of the SUBJECT ACCOUNT asked her to specifically send pictures of her "boobs, ass, or pussy." After the user of the SUBJECT ACCOUNT requested many times, Minor-1 sent the user of the SUBJECT ACCOUNT a video of her masturbating. Minor-1 indicated that the user of the SUBJECT ACCOUNT sent Minor-1 many videos of people having sex or "doing oral and anal sex." Minor-1 alleged the user of the SUBJECT ACCOUNT sent her many videos of himself masturbating. Minor-1 specified she saw his "whole penis" in these videos. Minor-1 was pretty sure, at some point, she directly told the user of the SUBJECT ACCOUNT that she was 11 years old. She advised she never lied to anyone about her age whenever she was talking to random people on social media. Minor-1 stated she knew for a fact that the user of the SUBJECT ACCOUNT knew she was underage because he stated a couple of times that their relationship together would not be legal.

18. The FBI reviewed the video recording, captured by MPD, of the Snapchat chats between the SUBJECT ACCOUNT and the MINOR-1 ACCOUNT. These chats occurred between June 15, 2020 and August 18, 2021. During that time, it appeared as though a sexual relationship developed



between the user of the SUBJECT ACCOUNT and Minor-1 through the Snapchat chats. The user of the SUBJECT ACCOUNT sent Minor-1 numerous videos and images of adult pornography and videos of himself masturbating. The user of the SUBJECT ACCOUNT requested Minor-1 send images of herself. Minor-1 sent the user of the SUBJECT ACCOUNT one image and one video, containing child pornography. There are also several acknowledgments of Minor-1's age by Minor-1 and the user of the SUBJECT ACCOUNT. The user of the SUBJECT ACCOUNT referred to Minor-1 as "baby girl" and "child." Minor-1 referred to the user of the SUBJECT ACCOUNT as "daddy."

19. On June 16, 2020, the following conversation occurred between the SUBJECT ACCOUNT and MINOR-1 ACCOUNT:

<u>SUBJECT ACCOUNT</u>	[video depicting what appears to be two adults engaging in anal intercourse]
<u>MINOR-1 ACCOUNT</u>	Damn
<u>SUBJECT ACCOUNT</u>	That should be us.
<u>MINOR-1 ACCOUNT</u>	[image depicting the face of Minor-1]
<u>SUBJECT ACCOUNT</u>	Lemmie see more of you [begging face emoji] I bet you won't pull a titty out [winking face emoji]
<u>MINOR-1 ACCOUNT</u>	I'm downstairs
<u>SUBJECT ACCOUNT</u>	Is there anyone around you?

MINOR-1 ACCOUNT

A lot.....I have a big family.

SUBJECT ACCOUNT

Jeez [begging face emoji] is there a bathroom you can go to? [crying face emoji]

MINOR-1 ACCOUNT

Wait haha I didn't show u I already had some.

SUBJECT ACCOUNT

Well send them mfs Lmaoo

MINOR-1 ACCOUNT

Okie

[two images depicting Minor-1, nude from the waist up with her breasts exposed, standing in a bathroom with beige tile in the background]

SUBJECT ACCOUNT

Your body is sooo [fire emoji] and drooling face emoji] But what kind of content should I post on my private?

MINOR-1 ACCOUNT

Idk

SUBJECT ACCOUNT

Damn okay lol but do you have more booty pics? [water droplets emoji]

MINOR-1 ACCOUNT

Lemme check

SUBJECT ACCOUNT

Okay babygirl [smiley face emoji]

MINOR-1 ACCOUNT

Hehe

[image depicting Minor-1 without clothing. She is standing in front of a white

toilet. Her breasts and genitals are exposed as she poses in a seductive manner.]

[image depicting Minor-1, wearing pants and no shirt, displaying her breasts. She appears to be capturing the photo with a cell phone, which she is holding near her face.]

[image depicting the nude buttocks of Minor-1.]

[image depicting Minor-1, without clothing, displaying her breasts. She appears to be capturing the photo with a cell phone, which she is holding near her face.]

[image depicting Minor-1, without clothing, displaying her breasts. She appears to be capturing the photo with a cell phone, which she is holding near her face.]

#### SUBJECT ACCOUNT

That ass is soo thick [drooling face emoji] Lemmie eat that pussy from the back and then give you these backshots while pulling your hair [eggplant emoji and woozy face emoji]

.....<sup>2</sup>

#### SUBJECT ACCOUNT

\*you bend over as I start eating that pussy aggressively from the

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<sup>2</sup> Signifies more messages between Minor-1 and the SUBJECT ACCOUNT not captured.



MINOR-1 ACCOUNT

SUBJECT ACCOUNT

MINOR-1 ACCOUNT

SUBJECT ACCOUNT

MINOR-1 ACCOUNT

SUBJECT ACCOUNT

MINOR-1 ACCOUNT

SUBJECT ACCOUNT

MINOR-1 ACCOUNT

SUBJECT ACCOUNT

back. Then once that pussy is wet, I then slide my big ass dick nice and deep inside you and stroke slowly making sure you feel every inch of that dick stretching that pussy out\* [water droplets emojis]

[3 drooling face emojis]

Daddy's dick feels good don't it baby? [drooling face emoji]

Ye

\*Once that pussy is stretched out, I slap that thick ass butt and pull your hair as I start pounding roughly\* You like anal baby? [eyes emoji and water droplets emoji]

Ehh

Would you try it

Yes

Okay bet i continue pounding that pussy as I carefully stick my thumb in your ass while still pulling your hair [face with horns emoji and water droplets emoji]

Hehe

I wanna fuck you so bad [crying face emoji and water drops emoji]

.....  
SUBJECT ACCOUNT

[image depicting what appears  
to be two adults in oral  
intercourse]

20. Later in the conversation, the user of the SUBJECT ACCOUNT requested Minor-1 to make a private story for him on Snapchat where she could “post nasty shit.” In response, Minor-1 explained she could not because of her “bf.” The user of the SUBJECT ACCOUNT persisted:

SUBJECT ACCOUNT

But I would be the only one that  
sees it wouldnt I? Especially if  
you set me as the only viewer

.....  
SUBJECT ACCOUNT

[Minor-1 refuses]  
  
I understand. I guess the next  
beat thing would be for you to  
just send me nasty stuff  
whenever you wanted to [heart  
emoji and smiley face emoji]

Would you do that for me?  
[drooling face emoji]

MINOR-1 ACCOUNT

Idk

SUBJECT ACCOUNT

I thought I was daddy [begging  
face emoji]

After several messages, Minor-1 informed the user of the SUBJECT ACCOUNT her “bf” is 13 years old. In response, the user of the SUBJECT ACCOUNT stated, “Ohhh okay that’s wassup.”

21. On June 17, 2020, during a conversation whereby Minor-1 is mentioning self-harm, the user of the SUBJECT ACCOUNT sent Minor-1 one video of an adult female masturbating an adult male's penis and texted, "This should be us [winking face emoji]." Later in the conversation, the user of the SUBJECT ACCOUNT sent a photo of an adult male's face. Your affiant compared a North Carolina driver's license photo of Dangelo Andre Elliott ("ELLIOTT"),<sup>3</sup> date of birth June 15, 1994, and found it was visually consistent with photo sent to Minor-1. After several more message exchanges, the following conversation occurred between the MINOR-1 ACCOUNT and SUBJECT ACCOUNT:

MINOR-1 ACCOUNT

[Image depicting Minor-1, who appears to be in the same bathroom identified in previous images, displaying her nude buttocks.]

SUBJECT ACCOUNT

Mmmm I wish I could feel that big ass [drooling face emoji]

[image depicting an erect male penis]

MINOR-1 ACCOUNT

Hehe

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<sup>3</sup> ELLIOTT'S North Carolina driver's license photograph was compared with the photo sent by the user of the SUBJECT ACCOUNT, after the FBI identified ELLIOTT'S residence as the residence of the subscriber who owned the IP address used to access the SUBJECT ACCOUNT.

SUBJECT ACCOUNT

Wanna get fucked by that big  
dick babygirl? [winking face  
emoji].

.....

SUBJECT ACCOUNT

Imma pound that pussy even  
harder as I start kissing you  
while gripping your throat at  
the same time while saying  
'whose pussy is this?! [winking  
with tongue out face emoji].

MINOR-1 ACCOUNT

[a video depicting Minor-1  
masturbating her genitals with  
her hand. She is not wearing  
underwear]

That's daddy's pussy.

SUBJECT ACCOUNT

Mmmmmm it looks so yummy  
baby [water droplets emojis]

.....

SUBJECT ACCOUNT

You horny?

MINOR-1 ACCOUNT

Maybe Definitely

SUBJECT ACCOUNT

[video depicting what appears to  
be an adult male masturbating  
and ejaculating]

MINOR-1 ACCOUNT

Ohh yessssss daddy U got me  
wet

SUBJECT ACCOUNT

I wish I could've busted all of  
that cum all over your sexy ass  
face baby [woozy face emoji]."

.....



SUBJECT ACCOUNT

[video depicting what appears to be three adults engaged in a sexual act]

I lift your leg and fuck you exactly like this [winking face emoji]

MINOR-1 ACCOUNT

Mmmmmmmmmmmmm daddy

SUBJECT ACCOUNT

We then transition from that to me ducking the shot out of you in missionary like this

[video depicting two adults engaged in vaginal intercourse]

.....

SUBJECT ACCOUNT

[winking face emoji] wanna send nudes for me babygirl?

MINOR-1 ACCOUNT

Ohhhh definitely daddy u made this pussy wet.

.....

SUBJECT ACCOUNT

[a video depicting an adult male masturbating]

[a video depicting two adults engaging in anal intercourse]

I have to go to sleep Bc I'm so tired but here's some of my videos for you to cum to until later [winking face emoji]

MINOR-1 ACCOUNT

Hehehehe ok

SUBJECT ACCOUNT

[image depicting an adult female engaging in a sexual act]

22. On June 20, 2020, after a discussion about Minor-1's boyfriend, the following message exchange occurred between the SUBJECT ACCOUNT and MINOR-1 ACCOUNT:

<u>SUBJECT ACCOUNT</u>	Lemmie see that body [begging face emoji]
<u>MINOR-1 ACCOUNT</u>	A bitch skinny asf
<u>SUBJECT ACCOUNT</u>	I know! I love your body! Especially when you're naked [kissing face emoji and heart face emoji]
<u>MINOR-1 ACCOUNT</u>	Lol
<u>SUBJECT ACCOUNT</u>	Let daddy see that ass [drooling face emoji]  .....
<u>SUBJECT ACCOUNT</u>	[a video depicting two adults engaged in anal intercourse]

After this, the user of the SUBJECT ACCOUNT sent Minor-1 three more videos and two images of adults engaged in sexual acts.

23. On June 21, 2020, the user of the SUBJECT ACCOUNT sent Minor-1 two images of adults engaged in anal intercourse and stated, "I wanna have that thicc booty like this [water droplets emoji and winking face emoji]." Later in the conversation, the user of the SUBJECT ACCOUNT sent Minor-1

one video of two adults engaged in oral intercourse and one video of two adults engaged in anal intercourse.

24. On June 22, 2020, the following exchange occurred between the SUBJECT ACCOUNT and MINOR-1 ACCOUNT:

SUBJECT ACCOUNT

[video depicting two adults engaged in anal intercourse]

I wanna have you like this  
[water droplets emoji]

MINOR-1 ACCOUNT

Bett

SUBJECT ACCOUNT

[two videos depicting two adults engaged in sexual intercourse]

This should be us

After several messages, the user of the SUBJECT ACCOUNT sent Minor-1 a video and two images of adults engaged in vaginal intercourse.

24. On June 25, 2020, the user of the SUBJECT ACCOUNT sent Minor-1 the following messages:

SUBJECT ACCOUNT

-that'll only make me start  
pounding harder making you  
scream loudly [drooling face  
emoji] once you cum a couple of  
times, I'll have you lay on the  
bed as I peel out the window and  
see your bf trying to come in as  
I open the window and let him  
in as he then takes his clothes  
off and slides into your pussy  
and fucks you while shove my  
dick in your throat and fuck

your face [water droplets  
emojis]

[video depicting three adults  
engaged in sexual intercourse]

25. On June 30, 2020, Minor-1 explained to the user of the SUBJECT ACCOUNT that someone on her Snap account needs to leave her alone. In response, the user of the SUBJECT ACCOUNT inquired about this person. Then, Minor-1 messaged, "He's like stfu ur only 11 u don't know the definition of real life I was like well I'm dating someone so I think I do."

26. On July 1, 2020, in response to the message Minor-1 had sent the user of the SUBJECT ACCOUNT from the previous day, the following exchange occurred between the SUBJECT ACCOUNT and MINOR-1 ACCOUNT:

SUBJECT ACCOUNT

Wtf is he even talking about?  
[crying face emoji and male  
emoji]

MINOR-1 ACCOUNT

I don't know the real definition  
of love

SUBJECT ACCOUNT

Nogga is stupid as hell for that  
lol."

Later in the conversation after the user of the SUBJECT ACCOUNT told Minor-1 he wanted to see her "ass" the following message exchange occurred:

SUBJECT ACCOUNT

[an image depicting an adult  
ejaculating]



MINOR-1 ACCOUNT

Oop

SUBJECT ACCOUNT

I wish it could've been on your  
face [water droplets emojis]

.....

SUBJECT ACCOUNT

Let papi see those beautiful tits  
baby

MINOR-1 ACCOUNT

[image depicting Minor-1 with  
no shirt on displaying her nude  
breasts. It appears Minor-1  
captured the image with her cell  
phone, which is near her face]

SUBJECT ACCOUNT

You sexy mf [orange crying face  
emoji and water droplets emoji]

27. On July 3, 2020, Minor-1 explained to the user of the SUBJECT ACCOUNT she cannot be on her phone from 8:00 a.m. until 1:30 p.m. because she got in trouble for talking back to her grandma.

28. On July 7, 2020, the user of the SUBJECT ACCOUNT sent Minor-1 an image of an adult female lying on a bed, wearing lingerie, and messaged: "Take a pic like this for me baby [drooling face emoji and begging emoji]." Minor-1 replied, "No." Later in the conversation, the user of the SUBJECT ACCOUNT sent her a picture of two adults engaged in oral intercourse and texted, "This should be us."

29. On July 8, 2020, Minor-1 advised the user of the SUBJECT ACCOUNT she was watching Netflix with her big brother who was 18 years old.

30. On July 10, 2020, the user of the SUBJECT ACCOUNT sent Minor-1 a video of an adult male masturbating and ejaculating.

31. On July 11, 2020, in response to the video sent by the SUBJECT ACCOUNT the previous day, Minor-1 texted, "Yummy" and the user of the SUBJECT ACCOUNT responded, "Come suck it off me baby."

32. On July 26, 2020, Minor-1 sent the user of the SUBJECT ACCOUNT a screen shot of a Snapchat chat between her and Snapchat user "Matt Ive." In the chat, "Matt Ive" asked Minor-1, "How old u" and she replied, "11."

33. On August 3, 2020, the user of the SUBJECT ACCOUNT sent Minor-1 a video of two adults engaged in anal intercourse and wrote, "Us."

34. On September 11, 2020, the user of the SUBJECT ACCOUNT sent Minor-1 a photo of an adult male. The North Carolina driver's license photo of ELLIOTT was visually consistent with the photo. In the photo, ELLIOTT is wearing a gray shirt and orange briefs; he has an erect penis. Later, the user of the SUBJECT ACCOUNT sent Minor-1 one video of an adult male masturbating while adult porn is playing on a television in the background. After a few messages, the user of the SUBJECT ACCOUNT sent Minor-1 two images of adults engaged in vaginal intercourse. Further conversation about the sexual activity the user of the SUBJECT ACCOUNT would perform on Minor-1 follows. Later in the conversation, the user of the SUBJECT

ACCOUNT wrote, "Let me see that ass." Minor-1 asked, "[crying and laughing face emojis] for what" and the user of the SUBJECT ACCOUNT responded, "So I can bust [water droplets emoji, begging face emoji, and crying face emoji]." After several messages, the user of the SUBJECT ACCOUNT texted, "Well you know you can send me pucs whenever you want baby [water droplets emoji, woozy face emoji, and drooling face emoji]." Later in the conversation, the user of the SUBJECT ACCOUNT sent Minor-1 three images of adults engaged in vaginal intercourse.

35. On November 25, 2020, the user of the SUBJECT ACCOUNT wrote, "This should be us" and sent Minor-1 one video of two adults engaged in vaginal intercourse.

36. On November 30, 2020, the following conversation between the SUBJECT ACCOUNT and MINOR-1 ACCOUNT occurred:

MINOR-1 ACCOUNT

Now you have to answer to all of these questions (and honestly [angel face emoji]) 1. Single? 2. What am I to you? 3. If I ask you for a hug, would I have it? 4. Rate me from 1 to 20. 5. Describe me. 6. Your favorite song? 7. You and I in a relationship, is it possible? 8. What could we do together? 9. If I ask you for a kiss, when would you do it? 10. Now send to your streaks 'can I ask you a question?' Be careful, you can be

surprised [crying and laughing face emoji]

SUBJECT ACCOUNT

1. Yes 2. A good friend 3. Yes. 4. 25 5.beautiful 6. dont have one. 7. Legally no. 8. a lot lol 9.lips and forehead.

37. On December 1, 2020, the following exchange occurred between the SUBJECT ACCOUNT and MINOR-1 ACCOUNT:

MINOR-1 ACCOUNT

Why aren't we dating

SUBJECT ACCOUNT

Bc we don't live that close to each other I'm sure and it wouldn't be legal [woozy face emoji]

38. On December 18, 2020, Minor-1 sent the SUBJECT ACCOUNT three images of herself standing in what appears to be the same bathroom as depicted in the previously referenced images of Minor-1. Descriptions of the images are below:

The first and second images depict Minor-1, not wearing clothing, displaying her breasts and buttocks.

The third image depicts Minor-1, not wearing clothing, displaying her buttocks.

In response, the user of the SUBJECT ACCOUNT asked, "Why is that ass so fat [woozy face emoji]."



39. On March 14, 2022, an administrative subpoena was issued to Snapchat for account subscriber information associated with the SUBJECT ACCOUNT. As a result of the subpoena, Snapchat provided the following account information:

Username:	"young_dre145"
Created:	April 27, 2013 at 17:27 UTC
Username New Value:	"dredasaint"
Timestamp:	February 26, 2022 at 19:35 UTC
Email Address:	dlilandre@aol.com
Phone Number:	(336) 689-7464
Status:	Active

The IP address 71.76.162.178 was identified 48 times in the account, between March 28, 2021 and January 17, 2022. A query of the American Registry for Internet Numbers ("ARIN") online database revealed IP address 71.76.162.178 as being registered to Charter Communications, Inc.

40. On March 31, 2022, an administrative subpoena was issued to Charter Communications, Inc. for subscriber information associated with IP address 71.76.162.178. As a result of the subpoena, Charter provided the following account information:

Subscriber Name:	Garlane Ellison
Service Address:	804 Mobile Street, High Point, North Carolina 27260-7443
User Name or Features:	3362578232@charter.net
Phone Number:	(336) 257-8232

41. On May 11, 2022, surveillance observed the residence located at 804 Mobile Street, High Point, North Carolina 27260. The residence is a single-family home with yellow siding. Address number "804" is displayed to the left of the front door. The property is listed in Guilford County GIS as deed book 4482, page 143, and parcel number 172915. Surveillance observed a blue 2004 Toyota Corolla with North Carolina tag TEH6438 parked at the residence.

42. According to the North Carolina Department of Motor Vehicles ("NCDMV"), ELLIOTT resides at 804 Mobile Street, High Point, North Carolina. According to the NCDMV, ELLIOTT is the registered owner of the observed Toyota Corolla.

43. On May 17, 2022, search warrants were issued out of the United States District Court for the Middle District of North Carolina for the residence at 804 Mobile Street, High Point, North Carolina 27260 and for the person of ELLIOTT. On May 18, 2022, members of the FBI as well as High Point Police Department executed the search warrants. One group of investigators went to the residence in High Point, North Carolina, while another made contact with ELLIOTT at his place of employment in High Point, North Carolina.

44. Prior to informing ELLIOTT of the search warrants, ELLIOTT voluntarily agreed to participate in an interview with the FBI and High Point Police Department. During the interview, ELLIOTT advised he was the user of the SUBJECT ACCOUNT. He has had this Snapchat account since

approximately 2013. Around late last year or earlier this year, he changed his Snapchat username from "young\_dre145" to "dredasaint."

45. ELLIOTT admitted to participating in sexual conversations with Minor-1 and advised he knew Minor-1 was 11 years old when they were communicating via Snapchat. ELLIOTT confirmed he sent Minor-1 an image of his penis. ELLIOTT explained his online relationship with Minor-1 lasted for a couple of months. During this time, Minor-1 sent ELLIOTT more than one photo of herself, without clothing. ELLIOTT specified that he saw her entire body. Minor-1 also sent ELLIOTT one video of her "twerking," without clothing. ELLIOTT explained Minor-1 sent him the referenced photos and video because he asked for it.

46. As the interview continued, ELLIOTT admitted to communicating online with another minor, Minor-2. The relationship began around 2018, when the minor was 13 years old, and continued until sometime last year. ELLIOTT communicated with Minor-2 through Snapchat, Facebook Messenger and telephone voice calls and text messages. During their online communications, Minor-2 sent ELLIOTT approximately 100 pictures of her breasts, buttocks, and vagina. ELLIOTT believed Minor-2 sent him approximately five videos of Minor-2 showing off her body, with and without clothing.



47. During the interview, ELLIOTT advised he has a preference in young girls around the age of 16 years old and up. Back when he was "heavier on it," referencing his sexual preferences towards minors, ELLIOTT showed an interest in the 11-year-old and 13-year-old minors, as previously referenced. ELLIOTT explained he started having feelings about minors in a sexual nature when he was around 22 or 23 years old.

48. As the interview continued, ELLIOTT advised he received child pornography online of girls who were 13 years old and up from other people, who he believed to be adults on Twitter<sup>4</sup> and Telegram.<sup>5</sup> At this time in the interview, the investigators made ELLIOTT aware of the search warrant and advised that they would seize his cell phone, which was in his hand. ELLIOTT agreed to show the interviewing Agents content stored on his iPhone. ELLIOTT opened a Twitter chat between himself, utilizing Twitter account "@GOATEDBBC69," and Twitter user "@Major\_Acantha1." On March 30, 2022, "@Major\_Acantha1" sent ELLIOTT nine Dropbox links and one Mega link. ELLIOTT admitted that each of these links contained files with child pornography. ELLIOTT attempted to access the links during the interview, but the files would not open on his iPhone. ELLIOTT advised, after he received the referenced links, he downloaded the files from links to his iPhone and then moved the files to his Samsung cell phone.



49. In the interview, ELLIOTT stated he identified a Twitter user who he thought looked about 14 years old, Minor-3. In reviewing Minor-3's Twitter account, ELLIOTT identified a Twitter user who commented on Minor-3's Twitter account. ELLIOTT initiated communications with this user. In these communications, ELLIOTT received a link to the user's Telegram account. ELLIOTT proceeded to show the interviewers a conversation that occurred on January 9, 2022, whereby ELLIOTT engaged in a Telegram chat, utilizing his Telegram account "Joe Maw," with Telegram user "saintshop'." The following conversation was identified on ELLIOTT'S iPhone in the Telegram application:

Joe Maw [video lasting approximately 5 seconds depicting Minor-3 lying on her stomach on a blanket, with a floral pattern, in what appears to be a bedroom. An adult male, wearing a red shirt and a black face mask, with the letters "QP," is anally or vaginally penetrating Minor-3. Minor-3 appears to be in distress. The reviewing Agent categorizes this video as Bondage, Dominance, Sadism and Masochism (BDSM.)]

Waasup? Do you have her content?

saintshop' yea you can have it for \$25

Joe Maw Okay bet

saintshop' you buying?

Joe Maw Yeah

How do I pay?

saintshop' cashapp

Joe Maw Whats your tag?

saintshop' \$spacexluvuv

Joe Maw [screenshot of the CashApp profile belonging to "\$spacexluvvy"]

This it?

saintshop' yea

Joe Maw Okay I just sent it

saintshop' ight finna send me

Next, Telegram user "saintshop" sent ELLIOTT nine videos, containing child pornography, depicting Minor-3. Descriptions of the videos are below.

1. Video lasting approximately 57 seconds depicting Minor-3 without clothing. An adult male is penetrating Minor-3's mouth with his penis.
2. Video lasting approximately one minute and 38 seconds depicting Minor-3 wearing a pink shirt. An adult male is penetrating Minor-3's mouth with his penis. Next, the video depicts Minor-3 exposing her genitals; her underwear is pulled down to her knees.
3. Video lasting approximately 37 seconds depicting Minor-3 without clothing. Minor-3 is sitting on a floral-patterned sofa. Her legs are apart and she is masturbating her genitals with her hand. There are several elementary educational posters on the wall in the background, including a poster about telling the time.
4. Video lasting approximately 48 seconds depicting Minor-3, wearing a blue shirt and blue patterned shorts, and another pubescent female minor, around the age of 13, wearing a white shirt and white patterned pants, undressing. Both minors remove their underwear and display their genitals in a lewd and lascivious manner. The minors are in what appears to be a bathroom, since towels are hanging from a rack on the wall in the background.

5. Video lasting approximately 22 seconds depicting Minor-3 wearing blue and pink underwear. Minor-3 removes the underwear and displays her genitals in a lewd and lascivious manner.
6. Video lasting approximately five seconds depicting an adult male anally penetrating Minor-3 with his penis. The adult is wearing a blue condom over his penis. Next, the video depicts an adult male penetrating Minor-3's mouth with his penis.
7. Video lasting approximately three minutes and 13 seconds and depicts Minor-3 masturbating an adult's erect penis with her hand, while another adult male anally penetrates her. All the individuals are unclothed.
8. Video lasting approximately one minute and 23 seconds depicting an adult male anally penetrating Minor-3 with his penis. The adult and Minor-3 are unclothed.
9. Video lasting approximately 58 seconds depicting an adult male anally penetrating Minor-3 with his penis. The adult is wearing a clear condom over his penis. The adult and Minor-3 are unclothed.

The conversation continues:

Joe Maw Thank you!

saintshop' yw lmk if you wanna buy some else

50. During the execution of the search warrant at 804 Mobile Street, High Point, North Carolina 27260, FBI Agents seized ELLIOTT'S Samsung cell phone. On May 31, 2022, a review of the contents of the Samsung cell phone identified videos previously described, depicting Minor-3, received by ELLIOTT via Telegram. Additional images of two possible minors around the age of 16, Minor-4 and Minor-5, engaged in sexually explicit activity, were also identified on ELLIOTT'S Samsung cell phone.



51. Based on my training and experience, individuals who engage in the elicitation and receipt of child pornography often communicate with minors and other like-minded individuals on numerous social media platforms. These individuals often store and maintain images, records, and communications relating to this illegal activity and often keep communications with other like-minded individuals saved in accounts. Because ELLIOTT elicited child pornography from Minor-1 and Minor-2 on Snapchat and possessed child pornography of minors on his iPhone and Samsung cell phones, I believe records relating to this illegal activity and to other persons involved with this activity will be found in the SUBJECT ACCOUNT and MINOR-1 ACCOUNT. Therefore, I submit that evidence and information related to violations of Title 18, United States Code, Sections 2252A(a)(2)(A), 2252A(a)(5)(B), and 2422(b) will be contained within the SUBJECT ACCOUNT and MINOR-1 ACCOUNT, including visual depictions of Minor-1 and Minor-2 engaged in sexually explicit conduct and logs of online chats.

#### **CHILD PORNOGRAPHY OFFENSES IN MODERN TECHNOLOGY**

52. Based on my investigative experience related to child pornography investigations, and the training and experience of other law enforcement officers with whom I have had discussions, I have learned that individuals who utilize the internet to view and receive images of child pornography are often individuals who have a sexual interest in children and in images of children,



and that there are certain characteristics common to such individuals, including the following:

- a. Individuals who have a sexual interest in children or images of children may receive sexual gratification, stimulation, and satisfaction from contact with children, or from fantasies they may have viewing children engaged in sexual activity or in sexually suggestive poses, such as in person, in photographs, or other visual media, or from literature describing such activity.
- b. Individuals who have a sexual interest in children or images of children may collect sexually explicit or suggestive materials, in a variety of media. Individuals who have a sexual interest in children or images of children oftentimes use these materials for their own sexual arousal and gratification. Further, they may use these materials to lower the inhibitions of children they are attempting to seduce, to arouse the selected child partner, or to demonstrate the desired sexual acts.
- c. Individuals who have a sexual interest in children or images of children also may correspond with and/or meet others to share information and materials, rarely destroy correspondence from other child pornography distributors/collectors, conceal such correspondence as they do their sexually explicit material, and often maintain lists of names, addresses, and telephone numbers of individuals with whom they have been in

contact and who share the same interests in child pornography. This data is typically in digital format, and often maintained on computers, cell phones and in online storage, email accounts or other online communication accounts.

53. Based on my investigative experience related to computer and internet related child pornography investigations, and the training and experience of other law enforcement officers with whom I have had discussions, I have learned the following:

- a. The development of computers, smartphones and the internet have added to the methods used by child pornography collectors to interact with and sexually exploit children. Additionally, child pornography is not "used up" as other types of contraband can be such as alcohol or drugs. Collections can be maintained on or off-site for years at a time without the "staleness" issues of other crime types. Computers, smartphones, and the internet serve four functions in connection with child pornography. These are production, communication, distribution, and storage.
- b. Smartphones have the capability to access the Internet and store information, such as videos and images. As a result, an individual using a smartphone can send, receive, and store files, including child pornography, without accessing a personal computer or laptop. An individual using a smartphone can also easily plug the device into a

computer (via a USB cable) or connect with a computer via Bluetooth, and transfer data files from one digital device to another. Some "smartphone" users can and do create, communicate, upload, and download child pornography, and communicate with children to coerce them or entice them to produce child pornography or perform sexual acts, by using internet based social media or electronic service providers like Instagram, Snapchat, or Apple (and many others).

- c. Child pornography can be transferred via electronic mail or through file transfer protocols (FTP) to anyone with access to a computer and modem. Because of the proliferation of commercial services that provide electronic mail service, chat services (i.e., "Instant Messaging"), easy access to the Internet, and online file sharing and storage, the computer is a preferred method of distribution and receipt of child pornographic materials.
- d. In my recent investigative experience, as well as recent discussions with law enforcement officers, I know that individuals who collect child pornography are using email accounts, online storage accounts, and other online communications accounts to obtain, store, maintain, and trade child pornography with growing frequency, in addition to, or as an alternative to, the use of personal devices.

54. Based on traits shared by collectors, the use of email, online storage accounts, and other online communication accounts, and on the evidence of known Internet-based communications, described above, there exists a fair probability that evidence regarding the receipt, possession, and elicitation of child pornography will be found within the SUBJECT ACCOUNT and MINOR-1 ACCOUNT.

**INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

55. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Snap Inc., to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

56. Because the warrant will be served on Snap Inc., who will then compile the requested records at a time convenient to Snap Inc., reasonable cause exists to support execution of the requested warrant at any time day or night.



### CONCLUSION

57. Based on the forgoing, I request that the Court issue the proposed search warrant. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711, 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is "a district court of the United States ... that – has jurisdiction over the offense being investigated." Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

Respectfully submitted,

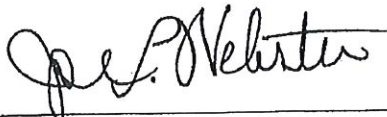
/s/ Emily R. Keller

Emily R. Keller

Special Agent

Federal Bureau of Investigation

Pursuant to Rule 4.1 of the Federal Rules of Criminal Procedure, the affiant appeared before me via reliable electronic means (telephone), was placed under oath, and attested to the contents of the written affidavit, on this the 6th day of June, 2022 at 8:58 a.m.



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HON. JOE L. WEBSTER  
UNITED STATES MAGISTRATE JUDGE  
MIDDLE DISTRICT OF NORTH CAROLINA

**ATTACHMENT A**

**Property to be Searched**

This warrant applies to records and other information related to the Snapchat accounts "young\_dre145" and [REDACTED] which are stored at premises owned, maintained, controlled, or operated by Snap Inc., at 2772 Donald Douglas Loop N, Santa Monica, CA 90405.

## **ATTACHMENT B**

### **Particular Things to be Seized**

#### **I. Information to be Disclosed by Snap Inc.,**

To the extent that the information described in Attachment A is within the possession, custody, or control of Snap Inc., including any information that has been deleted but is still available to Snap Inc., or has been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Snap Inc., is required to disclose the following information to the government for each username listed in Attachment A:

- a. All files, including video files, text, text files, images, multimedia, chats, and instant messages ("IMs") presently contained in the accounts or stored on behalf of the users;
- b. The contents of any Snaps, Stories, Chats and Memories;
- c. All business records and subscriber information, in any form kept, pertaining to the individual accounts described, including full name, user name, vanity name, physical address, telephone numbers, email addresses, registration details, date account was opened, length of service, the types of service utilized, ESN (Electronic Serial Number) or other unique identifier for the device(s) associated with the account,

Social Security number, date of birth, and other identifiers or records associated with the account;

- d. All transactional information of all activity of the accounts, including records of session times and durations, IP address used to register the account, IP addresses associated with session times and dates, account status and log files of Snaps, Stories, Chats and Memories;
- e. All contacts/friends lists; and
- f. All communications between Snapchat and the user(s) regarding the account, including contacts with support services and records of actions taken.

## **II. Information to be Seized by the Government**

All information described above in Section I that constitutes fruits, evidence, and instrumentalities of violations of Title 18 U.S.C. §§ 2252A(a)(2)(A), 2252A(a)(5)(B), and 2422(b) by the user(s) of the accounts identified on Attachment A, in the form of the following:

- a. Records and information constituting child pornography, as defined in 18 U.S.C. 2256(8);
- b. Records and information constituting child erotica;
- c. All images depicting any individual who is depicted in child pornography or child erotica found on either account;



- d. Records and information constituting or referencing threats to disseminate or make public images depicting any individual in a state of undress, including the fruit of any such threats;
- e. Records and information revealing the sexual exploitation of or sexual interest in any minor;
- f. Records and information constituting or revealing the identity and age of any minor victim;
- g. Records and information constituting or revealing communication between usernames "young\_dre145" and [REDACTED] and
- h. Records revealing or indicating who created, used, or communicated with the Snapchat usernames described in Attachment A, including records revealing or indicating their whereabouts at the time of use.

As used above, the terms "records" and "information" includes all forms of creation or storage, including any form of computer or electronic storage (such as hard disks or other media that can store data).

This warrant authorizes a review of electronically stored information, communications, other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in

addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.